

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-2(c)**

Robert Manchel, Esq.  
1 Eves Drive, Suite 111  
Marlton, NJ 08053  
Attorney for Debtor  
RM-1141

In Re:

Kimberly J. English

Case No. 18-33147ABA

Judge:

Chapter 13

**CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO**

**X CREDITOR'S MOTION or CERTIFICATION OF DEFAULT**

**TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT**

The debtor in the above-captioned chapter 13 proceeding hereby objects to the following  
(**choose one**):

1. \_\_\_\_ Motion for Relief from the Automatic Stay filed by \_\_\_\_\_,  
creditor. A hearing has been scheduled for \_\_\_\_\_, at 10:00 a.m.

OR

\_\_\_\_ Motion to Dismiss filed by the Standing Chapter 13 Trustee. A hearing has  
been scheduled for \_\_\_\_\_ at \_\_\_\_\_ a.m.

OR

X Certification of Default filed by Midfirst Bank, creditor. I am requesting  
that a hearing be scheduled on this matter.

OR

\_\_\_\_ Certification of Default filed by Standing Chapter 13 Trustee.  
I am requesting that a hearing be scheduled on this matter.

2. I am objecting to the above for the following reasons (**choose one**):

\_\_\_\_\_ Payments have been made in the amount of \$\_\_\_\_\_, but have not been accounted for. Documentation in support is attached hereto.

OR

\_\_\_\_\_ Payments have not been made for the following reasons and debtor proposes repayment as follows (**explain your answer**):

OR

**X** Other: I made a payment of \$5,000 on 4/4/2022. I will pay the balance of \$971.96 due for the March payment on 4/11/2022 and resume regular payments as of May 2022. I respectfully request that the movant's motion be denied so that I may continue and complete my bankruptcy plan.

3. This certification is being made in an effort to resolve the issues raised by the creditor in its motion.

4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 4/8/22

/s/ Kimberly J. English  
Kimberly J. English, debtor